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Of Attorneys for Defendant

103rd Multiplex LLC

UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

PORTLAND DIVISION

JESSICA SCHLESINGER,

Plaintiff,

v.

103RD MULTIPLEX LLC, CHRISTOPHER
BAIRD, ERIC MATSON,

Defendants.

Case No.: 3:23-cv-00546-JR

JOINT RULE 26(f) REPORT AND
DISCOVERY PLAN

Telephonic Fed. R. Civ. P. 16 Conference
Scheduled: July 17, 2023, at 1:30 P.M.

As ordered by Magistrate Judge Jolie A. Russo on May 18, 2023 each of the above named parties, through their counsel, have conferred pursuant to FRCP 26(f) on pretrial deadlines and hereby submit the following Joint Status Report and proposed case management schedule.

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JOINT STATUS REPORT

I. NATURE OF THE CASE

This lawsuit arises from alleged conditions existing at 6402 SE 103rd Avenue from February 2022 to November 2022. Plaintiff asserts that Defendant's failed to comply with ORS 90.320 and ORS 90.375. She also seeks declaratory relief in the form of a judgment declaring that this action may proceed against Christopher Baird and Eric Matson as co-defendants. Defendants deny Plaintiff's right to any of the relief sought.

DISCOVERY PLAN

The Parties have met and conferred and propose the case management schedule set forth below. Significantly, the parties have agreed to mediate this case on September 18, 2023, and have agreed to place all discovery deadlines after such mediation in the hope that this matter may resolve at mediation and without the need for any additional discovery.

The parties do not anticipate the need to modify any rule related to written discovery nor the number and time for depositions. The parties offer the following case management schedule:

EVENT	PROPOSED DEADLINE
File all pleadings pursuant to FRCP 7(a) and 15	October 6, 2023
Join all claims, remedies, and parties pursuant to FRCP 18 and 19	October 6, 2022
Close of fact discovery	April 12, 2024
Expert witness reports due	May 19, 2024
Rebuttal expert witness reports due	June 21, 2024
File any discovery motions or dispositive motions	July 19, 2024

Confer as to Alternative Dispute Resolution pursuant to LR 16-4(c)	August 16, 2024
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The Parties understand that the Court will request the submission of a pretrial order, an ADR certification and other trial materials, but defer to the Court as to the appropriate scheduling of those deadlines. The preliminary trial length estimate is 4-5 trial days.

Respectfully Submitted by:

	<u>Dated:</u> July 14, 2023.
<i>Of Attorneys for Plaintiff Jessica Schlesinger</i>	<p><i>s/ Emily Templeton</i> OSB Bar Number: 221744 Emily Templeton OlsenDaines 111 SW 5th Ave. Suite 3150 Portland, OR 97204 Telephone: 971-352-2503 Email: emily@underdoglawyer.com</p> <p><i>s/ Michael R. Fuller</i> OSB Bar Number: 09357 Michael R. Fuller OlsenDaines US Bancorp Tower 111 SW 5th Ave., Suite 3150 Portland, OR 97204 Telephone: 503-222-2000 Email: Michael@UnderdogLawyer.com</p>

	<u>Dated:</u> July 14, 2023.
<i>Of Attorneys for Defendant 103rd Multiplex LLC</i>	<p><i>s/ Gregory L. Baird</i> OSB Bar Number: 922212 Gregory L. Baird Gordon & Polscer, LLC 9020 SW Washington Square Road Suite 560 Tigard, OR 97223 Telephone: 503-242-2922 Email: gbaird@gordon-polscer.com</p> <p><i>s/ Joshua E. Tabak</i> OSB Bar Number: 214668 Joshua E. Tabak Gordon & Polscer, LLC 9020 SW Washington Square Road Suite 560 Tigard, OR 97223 Telephone: 503-242-2922 Email: jtabak@gordon-polscer.com</p>
	<u>Dated:</u> July 14, 2023.
<i>Of Attorneys for Defendant Christopher Baird</i>	<p><i>s/ Mark Joseph Firmin</i> OSB Bar Number: 225804 Mark Joseph Firmin, Jr MacMillan, Scholz, & Marks 900 SW Fifth Avenue Ste 1800 Portland, OR 97204 Telephone: 503-908-6546 Email: mfirmin@msmlegal.com</p>

	<p><i>s/ Megan L. Ferris</i> OSB Bar Number: 063404 Megan L. Ferris MacMillan Scholz and Marks 900 SW Fifth Ave Suite 1800 Portland, OR 97204 Telephone: 503-224-2165 Email: mferris@msmlegal.com</p>
	<p><u>Dated</u>: July 14, 2023.</p>
<p><i>Of Attorneys for Defendant Eric Matson</i></p>	<p><i>s/ Sarah Elizabeth Ames Benedict</i> OSB Bar Number: 132675 Sarah Elizabeth Ames Benedict Davis Wright Tremaine, LLP 1300 SW Fifth Avenue Suite 2400 Portland, OR 97201-5630 Telephone: 503-241-2300 Email: sarahbenedict@dwt.com</p> <p><i>s/ William D. Miner</i> OSB Bar Number: 043636 William D. Miner, III Davis Wright Tremaine, LLP 1300 SW Fifth Avenue Suite 2400 Portland, OR 97201-5630 Telephone: 503-241-2300 Email: billminer@dwt.com</p>